

1 COOLEY LLP
2 Heidi Keefe (178960)
3 (hkeefe@cooley.com)
4 Lowell Mead (223989)
5 (lmead@cooley.com)
6 Priya Viswanath (238089)
7 (pviswanath@cooley.com)
8 3175 Hanover Street
9 Palo Alto, CA 94304
10 Telephone: (650) 843-5000
11 Facsimile: (650) 849-7400

8 COOLEY LLP
9 Phillip Morton (*pro hac vice*)
10 (pmorton@cooley.com)
11 1299 Pennsylvania Avenue
NW, Suite 700
12 Washington, DC 20004-2400
13 Telephone: (202) 842-7800
14 Facsimile: (202) 842-7899

12 Attorneys for Defendant
Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18
19 COREPHOTONICS, LTD.,
Plaintiff,

Case No. 3:17-cv-06457-JD (lead case)
Case No. 5:18-cv-02555-JD

V.

**DECLARATION OF LOWELL MEAD IN
SUPPORT OF DEFENDANT'S MOTION TO
AMEND ANSWER**

22 Defendant.

Date: December 14, 2023
Time: 10 a.m.
Courtroom 11, 19th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

1 I, Lowell D. Mead, hereby declare:

2 1. I am a partner with Cooley LLP. I am counsel for Defendant Apple Inc. in this
3 action. I make this declaration in support of Defendant Apple Inc.'s Motion to Amend Answer.
4 I have personal knowledge of the facts contained within this declaration unless otherwise specified
5 herein, and if called as a witness, could testify competently to the matters herein.

6 2. Attached as **Exhibit A1** is a true and correct copy of the Proposed First Amended
7 Answer to Complaint for Patent Infringement, for Case No. 5:17-cv-06457.

8 3. Attached as **Exhibit A2** is a true and correct copy of the Proposed First Amended
9 Answer to Complaint for Patent Infringement, for Case No. 5:18-cv-02555.

10 4. Attached as **Exhibit B** is a true and correct copy of Defendant Apple Inc.'s Second
11 Set of Interrogatories to Plaintiff Corephotonics, Ltd. (Nos. 10-14), dated October 14, 2022.

12 5. Attached as **Exhibit C** is a true and correct copy of Defendant Apple Inc.'s
13 Second Set of Requests for Production to Plaintiff Corephotonics, Ltd. (Nos. 39-63), dated
14 October 14, 2022.

15 6. Apple produced a copy of APPL_COREP_00306918-APPL_COREP_00306955 on
16 February 24, 2023.

17 7. Attached as **Exhibit D** is a true and correct copy of an email from counsel for Apple
18 to counsel to Corephotonics, dated March 13, 2023.

19 8. Attached as **Exhibit E** is a true and correct copy of excerpts of the Transcript of
20 Proceedings, dated October 5, 2023.

21 9. Attached as **Exhibit F** is a true and correct copy of Plaintiff Corephotonics, Ltd.'s
22 responses and Objections to Defendant Apple Inc.'s Third Set of Interrogatories, dated
23 October 10, 2023.

24 10. Attached as **Exhibit G** is a true and correct copy of excerpts of the Share Purchase
25 Agreement, bearing Bates numbers COREPH077405 – COREPH077503.

26 11. Attached as **Exhibit H** is a true and correct copy of excerpts of Apple Inc.'s response
27 to Corephotonics's Third Supplemental Damages Contentions, dated May 9, 2023.

28 12. Attached as **Exhibit I** is a true and correct copy of excerpts of the agreement

1 produced at beginning Bates number APPL_COREP_00306918.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge.

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5 Dated: November 6, 2023

/s/ Lowell D. Mead
6 Lowell D. Mead

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